

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
ALEJANDRO MANUEL ZAPATA OSORIO,  
ATURO DEL RAZO, BRAULIO  
ROLANDO CASHAMBAMBA CHANGO, ET AL.,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

-against-

ANSWER

Civ. Ac.19-CV-4896  
(JH)(MST)

VECTOR STRUCTURAL PRESERVATION  
CORP. (D/B/A VECTOR STRUCTURAL  
PRESERVATION), NORTH STAR  
STRATEGY. INC. (D/B.A NORTH STAR  
STRATEGY), BILL HANDAKAS,  
VASSILIOS HANDAKAS and SERGIO DOE,

Defendants,

-----X  
Answering Defendants Vector Structural Preservation Corp. (d/b/a Vector Structural  
Preservation), Bill Handakas and Vassilios Handakas, by their attorneys Rabinowitz, Galina and  
Rosen, Esqs. as and for their Answer to the Collective Action Complaint states as follows:

1. Denies the allegations contained in paragraph "1" of the Complaint.
2. Admits that Defendant Vector Structural Preservation Corp. operates a construction corporation contained in paragraph "2" of the Complaint and denies the other allegations set forth in paragraph "2" of the Complaint. .
3. Admits that Defendant Vassilios Handakas is the principle of Defendant Vector contained in paragraph "3" of the Complaint and denies the other allegations set forth in paragraph "3" of the Complaint.
4. Denies the allegations contained in paragraph "4" of the Complaint.

5. Denies the allegations contained in paragraph “5” of the Complaint.
6. Denies the allegations contained in paragraph “6” of the Complaint.
7. Denies the allegations contained in paragraph “7” of the Complaint.
8. Denies the allegations contained in paragraph “8” of the Complaint.
9. Denies the allegations alleged in paragraph “9” of the Complaint.
10. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “10” of the Complaint. Defendants beg leave to refer to the cited statutes at trial.
11. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “11” of the Complaint. Defendants beg leave to refer to the cited statutes at trial.
12. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “12” of the Complaint. Defendants beg leave to refer to the cited statutes at trial.
13. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “13” of the Complaint. Defendants beg leave to refer to the cited statutes at trial.
14. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “14” of the Complaint.
15. Denies the allegations set forth in paragraph “15” of the Complaint.
16. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “16” of the Complaint.
17. Denies the allegations set forth in paragraph “17” of the Complaint.

18. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “18” of the Complaint.
19. Denies the allegations set forth in paragraph “19” of the Complaint.
20. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “20” of the Complaint.
21. Denies the allegations set forth in paragraph “21” of the Complaint.
22. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “22” of the Complaint.
23. Denies the allegations set forth in paragraph “23” of the Complaint.
24. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “24” of the Complaint.
25. Denies the allegations set forth in paragraph “25” of the Complaint.
26. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “26” of the Complaint.
27. Denies the allegations set forth in paragraph “27” of the Complaint.
28. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “28” of the Complaint.
29. Denies the allegations set forth in paragraph “29” of the Complaint.
30. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “30” of the Complaint.
31. Denies the allegations set forth in paragraph “31” of the Complaint.
32. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “32” of the Complaint.

33. Denies the allegations set forth in paragraph "33" of the Complaint.
34. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph "34" of the Complaint.
35. Denies the allegations set forth in paragraph "35" of the Complaint.
36. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph "36" of the Complaint.
37. Denies the allegations set forth in paragraph "37" of the Complaint.
38. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph "38" of the Complaint.
39. Denies the allegations set forth in paragraph "39" of the Complaint.
40. Denies the allegations contained in paragraph "40" of the Complaint.
41. Admits the allegations contained in paragraph "41" of the Complaint.
42. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph "42" of the Complaint.
43. Admits that Handakas is an owner of Defendant Vector only as set forth in paragraph "43" of the Complaint and denies all other allegations contained in paragraph "43" of the Complaint.
44. Denies the allegations contained in paragraph "44" of the Complaint.
45. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph "45" of the Complaint.
46. Denies the allegations contained in paragraph "46" of the Complaint.
47. Denies the allegations contained in paragraph "47" of the Complaint.
48. Denies the allegations contained in paragraph "48" of the Complaint.

49. Denies the allegations contained in paragraph “49” of the Complaint.
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210. Denies the allegations contained in paragraph “210” of the Complaint.
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226. Denies the allegations contained in paragraph “226” of the Complaint.
227. Denies the allegations contained in paragraph “227” of the Complaint.
228. Denies the allegations contained in paragraph “228” of the Complaint.
229. Denies the allegations contained in paragraph “229” of the Complaint.
230. Denies the allegations contained in paragraph “230” of the Complaint.
231. Denies the allegations contained in paragraph “231” of the Complaint.
232. Denies the allegations contained in paragraph “232” of the Complaint.

- 233. Denies the allegations contained in paragraph “233” of the Complaint.
- 234. Denies the allegations contained in paragraph “234” of the Complaint.
- 235. Denies the allegations contained in paragraph “235” of the Complaint.
- 236. Denies the allegations contained in paragraph “236” of the Complaint.
- 237. Denies the allegations contained in paragraph “237” of the Complaint.
- 238. Denies the allegations contained in paragraph “238” of the Complaint.
- 239. Denies the allegations contained in paragraph “239” of the Complaint.
- 240. Denies the allegations contained in paragraph “240” of the Complaint.
- 241. Denies the allegations contained in paragraph “241” of the Complaint.
- 242. Denies the allegations contained in paragraph “242” of the Complaint.
- 243. Denies the allegations contained in paragraph “243” of the Complaint.
- 244. Denies the allegations contained in paragraph “244” of the Complaint.
- 245. Denies the allegations contained in paragraph “245” of the Complaint.
- 246. Denies the allegations contained in paragraph “246” of the Complaint.
- 247. Denies the allegations contained in paragraph “247” of the Complaint.
- 248. Denies the allegations contained in paragraph “248” of the Complaint.
- 249. Denies the allegations contained in paragraph “249” of the Complaint.
- 250. Denies the allegations contained in paragraph “250” of the Complaint.
- 251. Denies the allegations contained in paragraph “251” of the Complaint.
- 252. Denies the allegations contained in paragraph “252” of the Complaint.
- 253. Denies the allegations contained in paragraph “253” of the Complaint.
- 254. Denies the allegations contained in paragraph “254” of the Complaint.
- 255. Denies the allegations contained in paragraph “255” of the Complaint.

- 256. Denies the allegations contained in paragraph “256” of the Complaint.
- 257. Denies the allegations contained in paragraph “257” of the Complaint.
- 258. Denies the allegations contained in paragraph “258” of the Complaint.
- 259. Denies the allegations contained in paragraph “259” of the Complaint.
- 260. Denies the allegations contained in paragraph “260” of the Complaint.
- 261. Denies the allegations contained in paragraph “261” of the Complaint.
- 262. Denies the allegations contained in paragraph “262” of the Complaint.
- 263. Denies the allegations contained in paragraph “263 of the Complaint.
- 264. Denies the allegations contained in paragraph “264” of the Complaint.
- 265. Denies the allegations contained in paragraph “265” of the Complaint.
- 266. Denies the allegations contained in paragraph “266” of the Complaint.
- 267. Denies the allegations contained in paragraph “267” of the Complaint.
- 268. Denies the allegations contained in paragraph “268” of the Complaint.
- 269. Denies the allegations contained in paragraph “269” of the Complaint.
- 270. Denies the allegations contained in paragraph “270” of the Complaint.
- 271. Denies the allegations contained in paragraph “271” of the Complaint.
- 272. Denies the allegations contained in paragraph “272” of the Complaint.
- 273. Denies the allegations contained in paragraph “273 of the Complaint.
- 274. Denies the allegations contained in paragraph “274” of the Complaint.
- 275. Denies the allegations contained in paragraph “275” of the Complaint.
- 276. Denies the allegations contained in paragraph “276” of the Complaint.
- 277. Denies the allegations contained in paragraph “277” of the Complaint.
- 278. Denies the allegations contained in paragraph “278” of the Complaint.

- 279. Denies the allegations contained in paragraph “279” of the Complaint.
- 280. Denies the allegations contained in paragraph “280” of the Complaint.
- 281. Denies the allegations contained in paragraph “281” of the Complaint.
- 282. Denies the allegations contained in paragraph “282” of the Complaint.
- 283. Denies the allegations contained in paragraph “283 of the Complaint.
- 284. Denies the allegations contained in paragraph “284” of the Complaint.
- 285. Denies the allegations contained in paragraph “285” of the Complaint.
- 286. Denies the allegations contained in paragraph “286” of the Complaint.
- 287. Denies the allegations contained in paragraph “287” of the Complaint.
- 288. Denies the allegations contained in paragraph “288” of the Complaint.
- 289. Denies the allegations contained in paragraph “289” of the Complaint.
- 290. Denies the allegations contained in paragraph “290” of the Complaint.

**AS AND FOR A FIRST CAUSE OF ACTION**

- 291. In response to paragraph “291” of the Complaint, the Answering Defendants  
herein repeat and reallege each and every answer to the allegations contained in  
paragraphs “1” through “290” of the Complaint with the same force and effect as if more  
fully set forth herein.
- 292. Denies the allegations contained in paragraph “292” of the Complaint.
- 293. Denies the allegations contained in paragraph “293” of the Complaint.
- 294. Denies the allegations contained in paragraph “294” of the Complaint.
- 295. Denies the allegations contained in paragraph “295” of the Complaint.
- 296. Denies the allegations contained in paragraph “296” of the Complaint.
- 297. Denies the allegations contained in paragraph “297” of the Complaint.

**AS AND FOR A SECOND CAUSE OF ACTION**

298. In response to paragraph “298” of the complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “297” of the Complaint with the same force and effect as if more fully set forth herein.

299. Denies the allegations contained in paragraph “299” of the Complaint.

300. Denies the allegations contained in paragraph “300” of the Complaint.

301. Denies the allegations contained in paragraph “301” of the Complaint.

**AS AND FOR A THIRD CAUSE OF ACTION**

302. In response to paragraph “302” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “301” of the Complaint with the same force and effect as if more fully set forth herein.

303. Denies the allegations contained in paragraph “303” of the Complaint.

304. Denies the allegations contained in paragraph “304” of the Complaint.

305. Denies the allegations contained in paragraph “305” of the Complaint.

306. Denies the allegations contained in paragraph “306” of the Complaint.

**AS AND FOR A FOURTH CAUSE OF ACTION**

307. In response to paragraph “307” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “306” of the Complaint with the same force and effect as if more fully set forth herein.

308. Denies the allegations contained in paragraph “308” of the Complaint.



309. Denies the allegations contained in paragraph “309” of the Complaint.

310. Denies the allegations contained in paragraph “310” of the Complaint.

**AS AND FOR A FIFTH CAUSE OF ACTION**

311. In response to paragraph “311” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “310” of the Complaint with the same force and effect as if more fully set forth herein.

312. Denies the allegations contained in paragraph “312” of the Complaint.

313. Denies the allegations contained in paragraph “313” of the Complaint.

**AS AND FOR A SIXTH CAUSE OF ACTION**

314. In response to paragraph “314” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “313” of the Complaint with the same force and effect as if more fully set forth herein.

315. Denies the allegations contained in paragraph “315” of the Complaint.

316. Denies the allegations contained in paragraph “316” of the Complaint.

**AS AND FOR A SEVENTH CAUSE OF ACTION**

317. In response to paragraph “317” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “316” of the Complaint with the same force and effect as if more fully set forth herein.

318. Denies the allegations contained in paragraph “318” of the Complaint.

319. Denies the allegations contained in paragraph “319” of the Complaint.

**AS AND FOR A EIGHTH CAUSE OF ACTION**

320. In response to paragraph “320” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “319” of the Complaint with the same force and effect as if more fully set forth herein.
321. Denies the allegations contained in paragraph “321” of the Complaint.
322. Denies the allegations contained in paragraph “322” of the Complaint.
323. Denies the allegations contained in paragraph “323” of the Complaint.
324. Denies the allegations contained in paragraph “324” of the Complaint.
325. Denies the allegations contained in paragraph “325” of the Complaint.

**AS AND FOR A NINTH CAUSE OF ACTION**

326. In response to paragraph “326” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “325” of the Complaint with the same force and effect as if more fully set forth herein.
327. Denies the allegations contained in paragraph “327” of the Complaint.
328. Denies the allegations contained in paragraph “328” of the Complaint.
329. The Answering Defendants specifically deny each and every allegation not previously answered herein.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

330. One or more Plaintiffs was a manager and/or supervisor and not an employee and thus not eligible for overtime.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

331. One or more of the Plaintiffs was not employed by any of the answering Defendants named herein.

**WHEREFORE**, the Answering Defendants herein respectfully request an Order dismissing the Complaint together with such other and further relief as to this court may seem just and proper.

Dated: Mineola, New York  
October 11, 2019

RABINOWITZ, GALINA AND ROSEN, ESQS.  
Attorneys for the Answering Defendants



By: Michael Rabinowitz, Esq. (MR-5654)  
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Attorneys for Plaintiffs  
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(212) 317-1200